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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**EX PARTE APPLICATION OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS PURSUANT TO B.L.R.
9013-1(c) FOR ENTRY OF AN ORDER
AUTHORIZING OVERSIZE BRIEF IN
OBJECTION TO CONFIRMATION OF
DEBTORS' AND SHAREHOLDER
PROONENTS' JOINT CHAPTER 11
PLAN OF REORGANIZATION DATED
MARCH 16, 2020**

The Official Committee of Tort Claimants (hereafter, the “TCC”), in the chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company (the “**Debtors**” or “**PG&E**”), by and through its undersigned counsel, hereby submits this Application (the “**Application**”) to the Court, pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California (the “**Bankruptcy Local Rules**”), for entry of an order authorizing the TCC to file an oversize brief (the “**Confirmation Brief**”) in support of the TCC’s objection to confirmation of the Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020. In support of this Application, the TCC respectfully submits the Declaration of Lauren T. Attard (the “**Attard Decl.**”), filed contemporaneously herewith.

MEMORANDUM OF POINTS AND AUTHORITIES

I. JURISDICTION

The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

II. BACKGROUND

In accordance with this Court’s orders on confirmation, including the order dated May 13, 2020 [Dkt. 7182], objections to confirmation of the Plan are due on May 15, 2020. The TCC now seeks to file its Confirmation Brief, which will address the numerous confirmation issues raised by the Plan.

III. OVERSIZE BRIEFING FOR THE CONFIRMATION BRIEF IS WARRANTED

Bankruptcy Local Rule 9013-1(c) provides that, “Unless the Court expressly orders otherwise, the initial and response memoranda of points and authorities shall not exceed 25 pages of text, and reply memorandum shall not exceed 15 pages of text.” B.L.R. 9013-1(c).

The TCC respectfully submits that cause exists for the TCC to exceed the 25-page limit for its Confirmation Brief. Although the TCC has limited the length of its briefing as much as possible, the gravity of the issues presented in the Plan and the importance of the Court’s determination of

1 the relief requested to the resolution of these Chapter 11 Cases have made it impracticable for the
2 TCC to limit further the size of the Confirmation Brief.

3 The Debtors' counsel have informed the TCC that they have no objection to this request.
4 *See* Attard Decl. at ¶ 8.

5 **WHEREFORE**, the TCC requests entry of an order granting the relief requested herein
6 and such other and further relief as the Court may deem just and appropriate.

7
8 Dated: May 15, 2020

Respectfully submitted,

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10 BAKER & HOSTETLER LLP

11 By: /s/ Lauren T. Attard
12 Lauren T. Attard

13 *Counsel to the Official Committee of Tort Claimants*
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